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Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.
: :
LEHMAN BROTHERS HOLDINGS INC., et al. : 08-13555 (JMP)
: :
Debtors. : (Jointly Administered)
: :
: :
-----x

**NOTICE OF SUPPLEMENTAL
DECLARATION OF LAWRENCE BORTSTEIN ON BEHALF
OF BORTSTEIN LEGAL LLC PURSUANT TO SECTION 327(e) OF THE
BANKRUPTCY CODE AND BANKRUPTCY RULES 2014(a) AND 2016(b)
IN SUPPORT OF THE DEBTORS' APPLICATION FOR AUTHORIZATION
TO EMPLOY AND RETAIN BORTSTEIN LEGAL LLC AS SPECIAL COUNSEL**

PLEASE TAKE NOTICE that, on December 9, 2008, Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the "Debtors") filed the attached Supplemental Declaration of Lawrence Bortstein on Behalf of Bortstein Legal LLC Pursuant to Section 327(e) of the Bankruptcy Code and Bankruptcy Rules 2014(a) and 2016(b) in Support of the Debtors' Application for Authorization to Employ and Retain Bortstein Legal LLC as Special Counsel.

Dated: December 9, 2008
New York, New York

/s/ Richard P. Krasnow

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**SUPPLEMENTAL
DECLARATION OF LAWRENCE BORTSTEIN ON BEHALF
OF BORTSTEIN LEGAL LLC PURSUANT TO SECTION 327(e) OF THE
BANKRUPTCY CODE AND BANKRUPTCY RULES 2014(a) AND 2016(b)
IN SUPPORT OF THE DEBTORS' APPLICATION FOR AUTHORIZATION
TO EMPLOY AND RETAIN BORTSTEIN LEGAL LLC AS SPECIAL COUNSEL**

LAWRENCE BORTSTEIN hereby declares, pursuant to section 1746 of title 28 of the United States Code, as follows:

1. I am the managing member of Bortstein Legal LLC (“Bortstein Legal”), located at 39 Walbrooke Road, Scarsdale, New York 10583. I am admitted to practice law in the State of New York. I submit this supplement (the “Supplemental Declaration”) to the original declaration (the “Original Declaration”) that I submitted in connection with the application (the “Application”)¹ of Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (together, the “Debtors”) to employ and retain Bortstein Legal as special counsel in the above-captioned chapter 11 cases, under the terms and conditions set forth in the Application. Except as otherwise noted, I have personal knowledge of the matters set forth herein.

¹ Capitalized terms that are used but not defined in this Second Supplemental Declaration have the meanings ascribed to them in the Application.

Additional Attorneys

2. Bortstein Legal LLC does not intend to engage independent contractors to perform legal services in relation to its retention by the Debtors under the Application.
3. If Bortstein Legal LLC engages an independent contractor to perform legal services for the Debtors, then Bortstein Legal LLC will pass the independent contractor's charges through to the Debtors, at actual cost.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 8th day of December 2008

/s/ Lawrence Bortstein

Lawrence Bortstein